FY 2012 Transit Security Grant Program (TSGP)
Workshop Q & A

TSGP Workshops March 13, 2012 through March 20, 2012
Orlando, FL; Phoenix, AZ, Teleconference

The below questions and answers were discussed at the two TSGP workshops and the teleconference workshop held in mid March 2012. For convenience they are arranged by the following question types: General; Period of Performance; Scoring & National Review Panel; Top Transit Asset list (TTAL); Maintenance & Sustainment; EHP Requirements; Project Priorities/Submissions.

General

Q: It appears with the focus this year on Presidential Policy Directive (PPD)-8 and the National Preparedness Goal (NPG), the focus of TSGP has been expanded to include response and recovery activities such as consequence management. Is this the case?

A: The focus of TSGP has not changed. The program continues to focus on the anti-terrorism security funding priorities as articulated in the Fiscal Year (FY) 2012 Funding Opportunity Announcement (FOA), and the allowable uses of funds in Section 1406 of the 9/11 Act. The NPG is directed to a much wider audience than transit security; so correspondingly, it includes mission areas and core capabilities applicable to the entire preparedness spectrum.

Q: Since all FY 2012 projects must align with the NPG core capabilities, where can I find more information or definitions of them?

A: You can find more information on PPD-8 and the NPG at **www.fema.gov/ppd8**.

Q: If we have specific questions about the FY 2012 TSGP risk model, who should we contact?

A: Send an email to **TSAGrants@tsa.dhs.gov** for assistance.

Q: Is the 10% cap for operational expenses still in effect since the 9/11 Act Authorization expired in FY 2011?

A: Yes. Although the funding authorization in the 9/11 Act ended with FY 2011, the legislation remains the authorizing statute for TSGP until such time as Congress passes, and the President signs, different legislation. For FY 2012, the authority to waive the operational cap, provided under Section 1406, has been delegated by the Department of Homeland Security (DHS) Secretary to the Federal Emergency Management Agency (FEMA) Administrator. As in FY 2011, we encourage agencies to apply for what they need. If the National Review Panel (NRP) recommends operational projects in excess of the 10% cap, a recommendation to waive the cap can be submitted to the FEMA Administrator for approval.

Period of Performance:

Q: What will be the start date of the two-year Period of Performance (POP)?

A: The start of the POP will be based on when FEMA issues the formal award documents. For FY 2011, it was September 1, 2011.

Q: With the 24 month POP is it realistic for an agency to submit any capital projects? With our agency's procurement processes, and the timeline associated with budget reviews and Environmental and Historic Preservation (EHP) reviews, the implementation window for the project would be very short.

A: Whether or not a project could be sensibly implemented and completed within the POP should always be a consideration for an agency prior to Investment Justification (IJ) project submissions, especially in FY 2012 with the shorter POP than has been historically seen in the TSGP. We understand this will be a vital concern particularly for capital project submissions, and we encourage agencies to submit "shovel ready" IJs for all capital projects, not just those with assets on the Top Transit Asset List (TTAL), that can be implemented within the POP. The "Remediation Plan Guide" in Appendix G of the FOA can assist with the "shovel ready" determination.

Q: With the shortened 24 month POP for FY 2012, will be it be possible for agencies awarded project funds to get "letters of no prejudice" or "pre-award authority" to expedite the procurement process?

A: FEMA will look into whether this is possible for FY 2012.

Scoring & National Review Panel

Q: Since the TSGP risk model has been updated to align with Port Security Grant Program, Urban Areas Security Initiative, and State Homeland Security Grant Program, does this mean that port or other non-transit specific components are being included in the calculation of the TSGP risk group scores?

A: No. The relative weights of the risk formula components of Threat, Vulnerability and Consequence are the same, however, the inputs of those components are relative too; and focus solely on transit as they relate to the TSGP.

Q: Can the NRP reach out to applicants during the review panels?

A: Yes, the NRP can reach out to clarify items such as definitions of terms or acronyms. It is very important that the person listed as the Point of Contact in Section I.A. of the IJ, be available and able to respond to those types of questions within 24 hours of receipt during the panels.

Q: In the scoring formula, which components are assigned scores by the NRP?

A: The risk mitigation component and the Regional Collaboration component are assigned scores by the NRP during panel reviews. The risk mitigation component is comprised of; 1) Cost Effectiveness, 2) Feasibility, 3) Timelines, 4) Sustainability and 5) Baseline

Assessment for Security Enhancement (BASE) Review Alignment for Priority A projects only, and Remediating TTAL Assets for Priority B projects only. The Risk Group Score for each agency is a product of the TSGP risk model, while the Funding Priority Area score is determined by the funding priority area that a project falls under, such as; Operational Activities, TTAL Asset Remediation or Operational Packages.

Q: Can the regional collaboration score be influenced by collaboration with, or impacts on non-transit entities, like local first responders or public works?

A: Yes. Regional collaboration is not limited to transit agencies. Any regional participation or benefit to a project should be explained in the IJ, and could result in additional points in that scoring component during NRP review. Keep in mind that activities such as drills and exercises must be anti-terrorism in nature and that TSGP may not be able to fund the participation of non-transit entities.

Q: How can an agency find out its new risk group score?

A: Send an email to **TSAGrants@tsa.dhs.gov** and the information can be provided to an authorized agency representative in accordance with Sensitive Security Information (SSI) handling protocols.

Top Transit Asset list (TTAL)

Q: How can my agency request that a new asset be added to the TTAL?

A: Requests to add assets to the TTAL can be sent to **TSAGrants@tsa.dhs.gov**. Refer to the "FY 2012 TTAL Asset Inclusion Process" document available on our website at **http://www.tsa.gov/what_we_do/grants/programs/tsgp/2012/index.shtm** for specific guidelines on preparing and submitting your request.

Q: How can an agency find out which assets it has on the TTAL?

A: Send an email to **TSAGrants@tsa.dhs.gov** and the information can be provided to an authorized agency representative in accordance with SSI handling protocols.

Maintenance & Sustainment

Q: Regarding Maintenance &Sustainment (M&S) costs mentioned in both Information Bulletin (IB) 336 and IB 379, which is the most current for guidance regarding the allowability of maintenance costs of non-TSGP funded equipment, etc?

A: IB 379, issued by FEMA on February 17, 2012 is the correct IB to reference in regards to allowability of M&S costs. M&S of non-TSGP funded equipment is now allowable.

Q: How will M&S projects be assigned to a funding priority area in FY 2012, especially those that are for items that were not funded under TSGP?

A: Requests for maintenance and sustainment of equipment funded under TSGP can be assigned to a Funding Priority Area score up to as high as the original project score. Remember to include information on the original TSGP project (e.g. fiscal year funded,

project name). For maintenance and sustainment of projects not funded under TSGP, articulate in the IJ the anti-terrorism use or deployment of the equipment, and the panel will assign a funding priority area based on the type of project the equipment supports.

EHP Requirements

Q: Why is FEMA requiring new EHP packages be submitted for projects that have already received an EHP, or other similar environmental clearance, such as the National Environmental Policy Act (NEPA)?

A: FEMA has been working to streamline the EHP process. As part of that, any existing EHP documentation and clearances be should be submitted as part of the new project EHP package to expedite reviews. For details, please contact the FEMA EHP office and your FEMA Program Analyst.

Project Priorities/Submissions

Q: If my agency wants to submit a project that is a follow-on phase of an existing project, how should I capture that in the IJ?

A: That would be captured in several places. If a project is a follow-on phase of an existing project, that should be explained in Section II.A in the project abstract. Results and security progress on the project to-date should be included under the Agency Background section in I.A. If this phase completes the project, this should also be clearly articulated in Section III: Impact.

Q: Are simunitions an allowable expense for training, drills and exercises in FY 2012?

A: Yes.

Q: Are Bomb Response and Intel Analyst Operational Packages (OPacks) that were funded under the FY 2007 TSGP Supplemental, eligible for sustainment in FY 2012?

A: Yes.

Q: If my agency applies and receives operational sustainment funding in FY 2012 for an FY 2007 project, are we responsible for funding the gap between the end of the FY 2007 POP and the start of the new FY 2012 POP?

A: Yes.

Q: If my agency is interested in submitting a project under Priority C for operational activities on overtime (surge support), but feels our specific deployment plans are too sensitive to submit in an IJ, how should we articulate our request?

A: Provide as much detail as you feel comfortable with to aid the panel in its review. For example, a list of the holidays or events you expect the overtime to cover, and an estimate of the number of labor hours and rates would be acceptable if the estimate basis is well explained. Also, keep in mind that the IJs are considered SSI again this year, and will be handled in accordance with SSI protocols.

Q: Can I submit a project under Priority C for operational activities on overtime (surge support) if my agency applied, and received funding, for the same project type in FY 2011?

A: Yes, you can apply for overtime surge support in FY 2012 if you received funding for surge support in FY 2011. There are a few things to keep in mind in this situation, though. First, the 24 month POP for FY 2012 and the 36 month operational project POP for FY 2011 will end at the same time, so any projects funded in FY 2012 will have the same implementation period as your FY 2011 projects. Second, if you received funding in FY 2011 for patrols on overtime or surge activities, your FY 2012 application should clearly outline what additional events, holidays or anti-terrorism activities the funding would support in addition to the FY 2011 funding, since the POPs will completely overlap.

Q: Should our agency also include information on vulnerability assessments in project applications for Priority D projects, since there is no additional BASE risk mitigation scoring component?

A: Yes. While there is not an additional scoring component in the risk mitigation score for Priority D projects, any project submission can be strengthened by explaining how the proposed project would close a specifically identified vulnerability when implemented as designed. Providing a short explanation of a specific vulnerability assessment finding, with the assessment type and date conducted, as this will aid the NRP when reviewing and scoring your project.

Q: The highest priority project for our agency falls in the lowest Funding Priority Area (FPA). How can we emphasize the importance of the project in our IJ?

A: For all project submissions, agencies are encouraged to specify how the proposed project would mitigate one or more vulnerability identified in a risk assessment. Include the assessment type, date conducted and any finding(s) related to the project submission. Other items to include, if relevant, that could help the NRP evaluate your project are to state whether the proposed project is the key remaining item to close a set of vulnerabilities, if the project is scalable, and how your agency may have addressed areas in higher FPA's which is why this specific project is now your highest priority.

Q: The suggestion was made to only include the agency background information, Section I.B., in one IJ, but our agency has found that failing to include data in all sections of the application results in audit findings and other recordkeeping issues. Will it count against us in the application process if we repeat the background information in each IJ we submit?

A: No, it definitely will not count against you to fill out section I.B. for each IJ. However, we ask that you include the same information in Section I.B. for all of your project submissions. Generally, the NRP will review this section once per agency, and if you include unique information in I.B. for one project but not another, it may be lost. Any unique or project-specific information should be included in Section II.A (Abstract), or later sections as appropriate.

Q: Can we submit attachments with our IJs, for example, a copy of a vulnerability assessment?

A: Yes, attachments can be submitted in ND Grants with your application. We do recommend that you summarize or otherwise articulate the key points from any attachments, or point them to specific pages/paragraphs in attachments, in your IJs since the members of the NRP will not be experts in your specific system, or have the time during their allotted review time to thoroughly read all attachments in their entirety.

Q: Are Memorandums of Understanding (MOU) or similar formal agreements between agencies required, prior to submitting a regional project?

A: No, MOUs or similar agreements are not required as part of the IJ submission for regional projects. However, the IJ should discuss how the regional partners are supportive of the project, and how they will all work together to complete the project. Also, keep in mind the 24 month POP and whether implementation of a regional project would require such agreements be in place. If the type of project, or policies in your or partner agencies would require an MOU, it could impact your ability to complete the project within the POP and should be factored into your timeline and plan for the project.

Q: How can I find out scores and feedback on my FY 2011 applications to assist with the preparation of my FY 2012 projects?

A: Send an email to your FEMA program analyst, and they can provide you with feedback on your FY 2011 project submissions.